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16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF WASHINGTON

18 SPOKANE DIVISION

19 JARED JACKSON,

20 Case No. 2:20-cv-00232

21 Plaintiff,

22 v.

23 LIVE NATION ENTERTAINMENT, INC., a  
24 Delaware Corporation; LIVE NATION  
WORLDWIDE, INC., a Delaware Corporation;  
CENTER STAGE INDUSTRIES LLC, a  
Washington Limited Liability Company; Chad  
Craig dba A WAY OF LIFE PRODUCTIONS  
dba AWOL Productions; and CONSCIOUS  
ENTERTAINMENT GROUP LLC, a  
Washington Limited Liability Company.

25 Defendants.

26 **COMPLAINT**

27 **DEMAND FOR JURY TRIAL**

28 **INTRODUCTION**

29 1. This is a negligence action seeking monetary damages for personal injuries.

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1 **JURISDICTION**

2       2. This Court has diversity jurisdiction over the parties pursuant to 28 U.S.C. Sec.  
3 1332(a). No defendant is a citizen of the same state as plaintiff and the amount in controversy  
4 exceeds \$75,000, exclusive of interest and costs.

5       3. Venue in this judicial district is proper pursuant to 28 U.S.C. Sec. 1391(b)(2)  
6 because a substantial part of the events or omissions giving rise to the claim occurred at the  
7 Gorge Amphitheater in Grant County, within this judicial district.

8 **PARTIES**

9       4. Plaintiff Jared Jackson at all times mentioned herein has been a resident of  
10 Arizona.

11       5. Defendant Live Nation Entertainment, Inc. (“Live Nation Entertainment”), is and  
12 at all times mentioned herein has been a Delaware corporation.

13       6. Defendant Live Nation Worldwide, Inc. (“Live Nation Worldwide”), is and at all  
14 times mentioned herein has been a Delaware corporation.

15       7. Defendants Live Nation Entertainment and Live Nation Worldwide are  
16 collectively referred to as “Live Nation.”

17       8. Defendant Center Stage Industries LLC (“Center Stage”) is and at all times  
18 mentioned herein has been a Washington limited liability company.

19       9. Defendant Conscious Entertainment Group LLC dba USC Events (“USC  
20 Events”) is and at all times mentioned herein has been a Washington limited liability company.

21       10. Defendant Chad Craig dba A Way of Life Productions (“AWOL”) is and at all  
22 times mentioned herein has been a resident of Nevada.

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24       ///

1 **FACTUAL ALLEGATIONS**

2 11. On or about June 23, 2017 Defendants Live Nation and USC Events jointly  
3 promoted a musical festival called Paradiso Festival 2017 held at the Gorge Amphitheater.

4 12. The Gorge Amphitheater is located at 754 Silica Rd NW, George, WA 98848.  
5 At all times mentioned herein Live Nation was the owner and venue operator of the Gorge  
6 Amphitheater.

7 13. Defendant Center Stage was a stage designer at the Paradiso Festival 2017 held at  
8 the Gorge Amphitheater.

9 14. Defendant AWOL was a stage designer at the Paradiso Festival 2017 held at the  
10 Gorge Amphitheater.

11 15. Plaintiff was employed as a tour manager and sound engineer for musical artists  
12 performing at the Paradiso Festival 2017 at the Gorge Amphitheater.

13 16. The musical artists that Plaintiff manages were in a Performance Agreement with  
14 USC Events to perform at the Paradiso Festival 2017 at the Gorge Amphitheater.

15 17. Prior to and during the stage set-up, Plaintiff put Defendants USC Events, Center  
16 Stage, and AWOL on notice of unsafe stage conditions that needed to be fixed prior to the  
17 performance of his artists and he believed they addressed it.

18 18. Alex Bosi, USC Events Production Manager, was a Stage Manager onsite at the  
19 Paradiso Festival 2017 on June 23, 2017.

20 19. On June 23, 2017, Maximilian Goessing of Center Stage Industries was onsite at  
21 the Festival. Plaintiff had direct communication with him throughout the day of June 23, 2017.

22 20. Chad Craig of AWOL was a stage designer onsite the day of the Festival. Plaintiff  
23 had direct communication with him throughout the day of June 23, 2017 regarding safety  
24 concerns of the stage.

21. Despite Plaintiff's prior warnings about the unsafe stage conditions, the stage was not properly marked or set-up at the time of the performance.

22. While on stage during the performance, Plaintiff fell through an eight-foot by eight-foot gap in the stage, which was covered with decorative camouflage netting.

23. Plaintiff fell approximately 12 feet, suffering severe injuries to his legs and body, requiring extraction by paramedics.

**CLAIM FOR RELIEF  
(Negligence)  
Against All Defendants**

24. Plaintiff was an invitee of defendants. Alternatively, plaintiff was a licensee of defendants. The above-described fall and injury were caused by the negligence of Defendants in one or more of the following particulars:

- a. In erecting and/or allowing the use of an elevated stage with gaps that people could fall through;
- b. In failing to place guard rails or physical barriers to prevent people from falling through the stage;
- c. In covering the gaps in the stage with camouflage netting;
- d. In failing to properly mark the stage;
- e. In failing to fill the gap prior to the performance;
- f. In failing to provide lighting to make the gaps in the stage easily visible; and
- g. In failing to have the stage ready for Plaintiff and the musical artists to be able to inspect the stage prior to the scheduled sound check, to ensure the safety of the stage.

These actions were unreasonable and dangerous. The conduct of covering the gap with camouflage was reckless given the absence of the lighting or warnings.

1       25.     As a result of the above-described fall and injury, Plaintiff suffered catastrophic  
2 compression and fracture injuries to his leg, including his right ankle, which had a severely  
3 comminuted shortened displaced tibial pilon fracture, as well as breaking 20 bones in his lower  
4 leg and ankle; and further suffered swelling, bruising, and extensive medical fracture blisters in  
5 the leg, all of which required two surgeries to correct, all to Plaintiff's noneconomic damages to  
6 be proven at trial.

7       26.     As a further result of the above-described accident and injury, Plaintiff has  
8 incurred medical expenses in the amount of \$55,000 and will in the future incur medical  
9 expenses in the amount of in an amount to be determined at trial.

10       27.     As a further result of the above-described accident and injury, Plaintiff lost  
11 income in the amount of \$50,000 and has suffered a loss of earning capacity in the amount of  
12 \$50,000.

13       28.     Plaintiff demands non-economic damages as allowed under Washington law.

14       29.     Plaintiff demands a jury

15       WHEREFORE, Plaintiff prays a joint and several judgment for economic damages,  
16 noneconomic damages, costs and disbursements, and equitable relief.

17       DATED: June 22, 2020

S/ Marshall W. Casey \_\_\_\_\_  
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Attorneys for Plaintiff